

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JAMALL S. BAKER,

Plaintiff,

v.

TAMMY O'REILLY, et al.,

Defendants.

NO: 2:21-cv-00361-MJP

STIPULATED MOTION FOR LEAVE TO  
FILE PLAINTIFF'S TRIAL BRIEF

NOTE DATE: JUNE 10, 2025

Plaintiff's counsel submits this Stipulated Motion for Leave to File Plaintiff's Trial Brief, which was due on June 9, 2025, for good cause. Counsel's delay in filing was unintentional, unexpected, and not caused by any bad faith or intentional disregard of the rules.

Plaintiff and Defendants' counsel timely exchanged their Proposed Jury Instructions on May 19, 2025, and timely met and conferred pursuant to LCR 16(f). Since then, the Parties have made additional concerted efforts to confer, revise, and thoughtfully reach agreements on the Instructions, Proposed Verdict Forms, and the Proposed Pretrial Order.

On June 9th, the Parties met and conferred to make further and final agreements on the Preliminary and Final Jury Instructions, neutral statement of the case, and stipulated facts. Plaintiff's counsel offered to incorporate both parties' final revisions and file each of the respective documents.

MOTION FOR LEAVE TO FILE PL.'S TRIAL BRIEF  
(NO. 2:21-cv-00361-MJP) - 1

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(206) 622-2000

Shortly before filing, Plaintiff's counsel was unable to locate the final drafts of Plaintiff's Objections to Defendants' Proposed Instructions and Plaintiff's Trial Brief on her computer. Plaintiff's counsel spent several hours trying to recover and restore the final drafts but was unable to do so. As a result, Plaintiff's counsel had no choice but to rewrite Plaintiff's Objections and Trial Brief. Plaintiff's counsel promptly informed Defense counsel of the unfortunate and untimely technical problems. Defense counsel stipulated that Plaintiff's counsel informed him of the issue and that Plaintiff's delay in filing was a result of the unexpected technical issues.

Accordingly, Plaintiff respectfully requests the Court to grant him leave to file his trial brief.

Dated this 10th day of June 2025.

BYRNES KELLER CROMWELL LLP

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MOTION FOR LEAVE TO FILE PL.'S TRIAL BRIEF  
(NO. 2:21-cv-00361-MJP) - 2

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**~~PROPOSED~~ ORDER**

Based on the Stipulated Motion for Leave to File Plaintiff's Trial Brief and good cause appearing, IT IS HEREBY ORDERED that the foregoing Motion be GRANTED. Plaintiff's Trial Brief will be accepted and added to the trial record.

Dated this 13th day of June 2025.



Marsha J. Pechman  
United States Senior District Judge

Presented by:

BYRNES KELLER CROMWELL LLP

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MOTION FOR LEAVE TO FILE PL.'S TRIAL BRIEF  
(NO. 2:21-cv-00361-MJP) - 3

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